

Exhibit A

 **EFILED IN OFFICE**
CLERK OF STATE COURT
BIBB COUNTY, GEORGIA
22-SCCV-093745
JBH
JAN 03, 2022 11:33 AM

IN THE STATE COURT OF BIBB COUNTY
STATE OF GEORGIA

CORNELIA HORTON,

Plaintiff,

v.

FAMILY DOLLAR STORES OF GEORGIA,
LLC, and JOHN DOES NOS. 1-10,

Defendants.

Civil Action No. _____


Patricia M. Graves, Clerk of State Court
Bibb County, Georgia

ORIGINAL COMPLAINT FOR DAMAGES

COMES NOW, Plaintiff Cornelia Horton, by and through her undersigned attorneys of record, and hereby files this Complaint for Damages, respectfully showing the following:

1.

The Defendant Family Dollar Stores of Georgia, LLC (hereinafter "Family Dollar") is a foreign limited liability company that is licensed to conduct business in the State of Georgia and maintains a registered agent in Gwinnett County, Georgia, and is subject to the venue and jurisdiction of this Court, pursuant to O.C.G.A. § 14-2-510.

2.

The Defendant John Does Nos. 1-10, at all times relevant to this Complaint for Damages, was and is a manager, employee, and/or agent of the Defendant Family Dollar, subjecting him to the jurisdiction and venue of this Court as a joint tortfeasor.

3.

The Defendant Family Dollar owns and/or operates the retail store and premises located at 2035 Shurling Dr, Macon, GA 31211 (hereinafter "subject premises").

4.

On or about January 11, 2020, on the subject premises, the Plaintiff, as an invitee, slipped and fell due to a hazardous substance on the floor of the Defendant's Family Dollar as a result of the negligence of the Defendant Family Dollar and John Does Nos. 1-10.

5.

The Defendant John Does Nos. 1-10, a manager, employee, and/or agent of the Defendant Family Dollar, was negligent, as pled in ¶4, by failing to provide sufficient warning of the subject dangerous substance, by failing to inspect and discover the presence of the dangerous substance, by failing to remedy and/or remove the dangerous substance, and by failing to use ordinary care in preventing hazardous conditions that could result in a slip and/or fall.

6.

The Defendant Family Dollar, the owner and/or operator of the subject premises, was negligent, as pled in ¶4, by failing to provide sufficient warning of the subject dangerous substance, by failing to inspect and discover the presence of the dangerous substance, by failing to remedy and/or remove the dangerous substance, and by failing to use ordinary care in preventing hazardous conditions that could result in a slip and/or fall, and by hiring and retaining an unsafe employee(s), to wit: Defendant John Does Nos. 1-10.

7.

As a proximate and foreseeable result of the Defendants' negligence, the Plaintiff was seriously injured, incurring medical expenses in excess of \$50,700.00, as well as lost wages in excess of \$1.00.

8.

In addition to ¶7, the Plaintiff has endured and will continue to endure pain and suffering.

9.

The Plaintiff has a cause of action against the Defendant John Does Nos. 1-10 for negligence and all other applicable theories of liability.

10.

The Plaintiff has a cause of action against the Defendant Family Dollar for negligence, negligent hiring and retention of an unsafe employee(s), *respondeat superior*, and all other applicable theories of liability.

11.

The Plaintiff is entitled to recover from the Defendants for her past and future medical expenses, lost wages, past and future pain and suffering, and all other damages permitted by law.

WHEREFORE, Plaintiff prays that she have a judgment against the Defendants in an amount determined by a fair and impartial jury to be adequate and just.

{Signature on Following Page}

Respectfully submitted this the 3rd day of January 2022.

/s/ David Dozier
David Dozier
GA Bar No. 228898
Attorney for Plaintiff

DOZIER LAW FIRM, LLC
487 Cherry Street
P.O. Box 13
Macon, GA 31202-0013
P: (478) 742-8441
david@dozierlaw.com

DEFENDANT SHALL BE SERVED AT THE FOLLOWING:

Family Dollar Stores of Georgia, LLC

Registered Agent:
Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092

**STATE COURT OF BIBB COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 22-SCCV-093745

Horton, Cornelia

PLAINTIFF

VS.

Family Dollar Stores of Georgia, LLC
John Does, 1-10

DEFENDANTS

SUMMONS

TO: FAMILY DOLLAR STORES OF GEORGIA, LLC

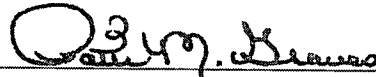
You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**David Dozier
Dozier Law Firm
327 Third Street
Macon, Georgia 31201**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 3rd day of January, 2022.

Clerk of State Court



Patricia M. Graves, Clerk of State Court
Bibb County, Georgia

General Civil and Domestic Relations Case Filing Information Form

☐ Superior or ☒ State Court of Bibb County

22-SCCV-093745

JBH

JAN 03, 2022 11:33 AM

For Clerk Use Only

Date Filed 01-03-2022

MM-DD-YYYY

Case Number 22-SCCV-093745

Patricia M. Graves
Patricia M. Graves, Clerk of State Court
Bibb County, Georgia

Plaintiff(s)

Horton, Cornelia

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Plaintiff's Attorney Dozier, David

Defendant(s)

Family Dollar Stores of Georgia, LLC

Last	First	Middle I.	Suffix	Prefix

John Does, 1-10

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Bar Number 228898Self-Represented ☐

Check one case type and, if applicable, one sub-type in one box.

General Civil Cases

- ☐ Automobile Tort
☐ Civil Appeal
☐ Contract
☐ Contempt/Modification/Other Post-Judgment
☐ Garnishment
☐ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☐ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☒ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Contempt
☐ Non-payment of child support, medical support, or alimony
☐ Dissolution/Divorce/Separate Maintenance/Alimony
☐ Family Violence Petition
☐ Modification
☐ Custody/Parenting Time/Visitation
☐ Paternity/Legitimation
☐ Support – IV-D
☐ Support – Private (non-IV-D)
☐ Other Domestic Relations

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

Sheriff Number: 22000472 Court Case Number: 22-SCCV-093745 BIBB STATE
 Date Received: 1/7/2022 Time: 12:11 PM
 Special Service Inst:

State of Georgia
 Gwinnett County

ATTORNEY'S ADDRESS

DOZIER LAW FIRM LLC
 327 3RD STREET
 MACON, GA 31201

CORNELIA HORTON
 PLAINTIFF

VS.

FAMILY DOLLAR STORES OF GEORGIA LLC
 DEFENDANT

NAME AND ADDRESS OF PARTY TO BE SERVED

FAMILY DOLLAR STORES OF GEORGIA LLC
 C/O C S C
 2 SUN CT STE 400
 PEACHTREE CORNERS, GA 30092

SHERIFF'S ENTRY OF SERVICE

PERSONAL ☐ Sex _____ Skin Color _____ Hair Color _____ Age _____ Hgt _____ Wgt _____
 I have this day served the defendant _____ personally with a copy of the within action and summons.

NOTORIOUS ☐
 I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place in this County.

Delivered same into the hands of _____ described as follows:

SEX	SKIN COLOR	HAIR COLOR	AGE	HGT	WGT

CORPORATION ☒

I have this day served the FAMILY DOLLAR STORES OF GEORGIA LLC a corporation by leaving a copy of the within action and summons with ALISHA SMITH R.A. in charge of the office and place of doing business of said Corporation in this County.

TACK AND MAIL ☐

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST ☐

Diligent search made and defendant _____ not to be found in the jurisdiction of this Court.

SPECIAL PROCESS SUMMONS, COMPLAINT, INTERR, REQ PRODUCTION, ADMISSIONSCOMMENTS

Subscribed and sworn be to before this

_____ day of _____, _____

Notary public in and for said County and State

Date: 01-10-2022

Time: _____

Sgt. G. L. Smith, 20500
 Deputy Sheriff